

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

BAY STATE GAS COMPANY

D.T.E. 05-27

**ATTORNEY GENERAL'S NINETEENTH SET OF
DOCUMENT AND INFORMATION REQUESTS**

The following are the Attorney General's NINETEENTH SET of discovery and information requests.

- AG-19-1 Referring to the Company's response to Information Request AG-1-5, please provide a copy of all monthly operations reports generated by the Company for the months of the test year in this case. Please also provide a cover sheet to this response that lists by topic and by date each of these reports included in the response.

- AG-19-2 Referring to the Company's response to Information Request AG-1-20, please indicate the nature of the Brockton "non-utility" land and building that was sold and the business it was used for by the Company.

- AG-19-3 Referring to the Company's response to Information Request AG-1-22, please indicate the amount of pro forma property taxes shown on Exhibit BSG/JES-1, Schedule JES-9, page 2, line 1 that were allocated to those properties.

- AG-19-4 Referring to the Company's response to Information Request AG-1-23, please provide the amount of overheads and / or indirect costs that were assigned / allocated to the construction work in progress.

- AG-19-5 Referring to the Company's response to Information Request AG-1-25, please provide the workpapers, calculations, formulas, assumptions, and other supporting documentation for the \$64,747 "Equity Return" amount shown for the Northern Utilities building.

- AG-19-6 Referring to the Company's response to Information Request AG-1-26, please provide a redlined copy of the Affiliate Service Agreement with NiSource Corporate Services Company dated March 31, 2005, showing the changes made to the agreement that existed before.
- AG-19-7 Referring to the Company's response to Information Request AG-1-26, please provide a redlined copy of the Bay State Gas Company Amended Services Agreement with Northern Utilities dated January 1, 2005, showing the changes made to the agreement that existed before that one.
- AG-19-8 Referring to the Company's response to Information Request AG-1-27, please identify the nature of the functions of each of the Cost Centers 5500, 5315, 3500, and 3315, referred to in Part (C) of that response.
- AG-19-9 Referring to the Company's response to Information Request AG-1-27, please provide a complete and detailed description of the methodology used to allocate the Call Center costs in Cost Center 02235.
- AG-19-10 Referring to the Company's response to Information Request AG-1-27, please provide a complete and detailed description of the methodology used to allocate the Revenue Recovery costs in Cost Center 02240.
- AG-19-11 Referring to the Company's response to Information Request AG-1-27, please provide a complete and detailed description of the methodology used to allocate the Dispatch costs in Cost Center 01271.
- AG-19-12 Referring to the Company's response to Information Request AG-1-29, please reconcile the rent revenues shown on that page with the amount shown on page 43, line 19 – 493 Rent from Gas Property of the Company's 2004 Annual Return to the Department.
- AG-19-13 Referring to the Company's response to Information Request AG-1-34 A, for 2004, Account 649506 indicates that there were "Special Deals" during that year. Please indicate who the "Special Deals" were with, provide the contracts associated with the deals, and indicate to whom the associated margins were flowed.
- AG-19-14 Referring to the Company's response to Information Request AG-1-35, please provide the name, title, and job responsibilities of the employee with ID number 470243 as indicated on page 9 of the response. Please also provide the terms of the incentive plan that provide the \$100,000 of incentive pay indicated there.

- AG-19-15 Referring to the Company's response to Information Request AG-1-40, please provide an explanation for the 25 percent increase in the rate of wages and salaries capitalized between 2003 and 2004 (from a rate of 16.60 percent to 20.63 percent).
- AG-19-16 Referring to the Company's response to Information Request AG-1-40, Attachment (a), page 5, please provide the workpapers, calculations, formulas, assumptions, and other supporting documentation for the Discount Rate of 6.00 percent used for the determination of the benefits obligation. Please also provide a complete and detailed description of the reasons that it is different from the Discount Rate used to determine the net periodic benefit cost.
- AG-19-17 Referring to the Company's response to Information Request AG-1-40, Attachment (a), page 5, please provide the workpapers, calculations, formulas, assumptions, and other supporting documentation for the Rate of Compensation Increases of 4.00 percent used for the determination of the benefits obligation.
- AG-19-18 Referring to the Company's response to Information Request AG-1-40, Attachment (a), page 5, please provide the workpapers, calculations, formulas, assumptions, and other supporting documentation for the Discount Rate of 6.25 percent used for the determination of the net periodic benefit cost.
- AG-19-19 Referring to the Company's response to Information Request AG-1-40, Attachment (a), page 5, please provide the workpapers, calculations, formulas, assumptions, and other supporting documentation for the Rate of Compensation Increases of 4.00 percent used for the determination of the net periodic benefit cost.
- AG-19-20 Referring to the Company's response to Information Request AG-1-40, Attachment (a), page 5, please provide the workpapers, calculations, formulas, assumptions, and other supporting documentation for the Expected Long-Term Rate of Return on Plan Assets of 9.00 percent used for the determination of the net periodic benefit cost. Please include in the response the assumed allocation of assets and the assumed returns on each of those asset classes.
- AG-19-21 Referring to the Company's response to Information Request AG-1-40, Attachment (d), page 7, please provide the workpapers, calculations, formulas, assumptions, and other supporting documentation for the Discount Rate of 6.00 percent used for the determination of the benefits obligation. Please also provide a complete and detailed description of the reasons that it is different from the Discount Rate used to determine the net periodic benefit cost.

- AG-19-22 Referring to the Company's response to Information Request AG-1-40, Attachment (d), page 7, please provide the workpapers, calculations, formulas, assumptions, and other supporting documentation for the Health Care Cost Trend rates used for the determination of the benefits obligation.
- AG-19-23 Referring to the Company's response to Information Request AG-1-40, Attachment (d), page 7, please provide the workpapers, calculations, formulas, assumptions, and other supporting documentation for the Discount Rate of 6.25 percent used for the determination of the net periodic benefit cost.
- AG-19-24 Referring to the Company's response to Information Request AG-1-40, Attachment (d), page 7, please provide the workpapers, calculations, formulas, assumptions, and other supporting documentation for the Expected Return on Plan Assets of 8.75 percent used for the determination of the net periodic benefit cost. Please include in the response the assumed allocation of assets and the assumed returns on each of those asset classes.
- AG-19-25 Referring to the Company's response to Information Request AG-1-40, Attachment (e), page 8, please provide the workpapers, calculations, formulas, assumptions, and other supporting documentation for the Expected Return on Plan Assets of 7.50 percent used for the determination of the net periodic benefit cost. Please include in the response the assumed allocation of assets and the assumed returns on each of those asset classes.
- AG-19-26 Referring to the Company's response to Information Request AG-1-53, please indicate the reasons that the majority of the vehicles listed in the response indicate both a monthly lease payment as well as an acquisition cost. If only one was supposed to be listed for each vehicle, please provide a supplemental response which indicates the one appropriate cost or payment.
- AG-19-27 Referring to the Company's response to Information Request AG-1-55, please itemize and quantify the amount of the Corporate Transport Aircraft costs, including capital costs, as well as operating costs assigned and / or allocated to Bay State Gas during the test year in this case.
- AG-19-28 Referring to the Company's response to Information Request AG-1-57, please provide a complete and detailed description of the reasons that the Account 692205 Payroll / Benefit cost transferred for Management Fee billings decreased by over one million dollars during the test year.
- AG-19-29 Referring to the Company's response to Information Request AG-1-57, please breakout the Account 692200 Payroll / Benefits costs transferred to Capital between Payroll and Benefits.

AG-19-30 Referring to the Company's response to Information Request AG-1-63(B), page 2, please provide a complete and detailed description of the nature of the claims and / or liabilities associated with the following Credits to the Accrual Insurance – General Liability:

- | | | |
|-----|---------------|-------------|
| (1) | February 2003 | \$1,000,000 |
| (2) | August 2003 | \$1,000,000 |
| (3) | December 2003 | \$894,825 |

AG-19-31 Referring to the Company's response to Information Request AG-1-63(B), page 6, please provide a complete and detailed description of the nature of the claims and / or liabilities associated with the following Credit to the Accrual Insurance – General Liability:

- | | | |
|-----|---------------|------------|
| (1) | November 2002 | \$792,460. |
|-----|---------------|------------|

AG-19-32 Referring to the Company's response to Information Request AG-1-63(B), pages 7-8, please provide a complete and detailed description of the nature of the claims and / or liabilities associated with the following Debits to the Accrual Insurance – General Liability:

- | | | |
|-----|---------------|-----------|
| (1) | June 2001 | \$363,225 |
| (2) | December 2001 | \$170,000 |
| (3) | December 2001 | \$170,197 |

AG-19-33 Referring to the Company's response to Information Request AG-1-63(B), pages 11-12, please provide a complete and detailed description of the nature of the claims and / or liabilities associated with the following Debits to the Accrual Insurance – General Liability:

- | | | |
|-----|----------------|-----------|
| (1) | April 2000 | \$82,634 |
| (2) | June 2000 | \$231,707 |
| (3) | July 2000 | \$91,817 |
| (4) | September 2000 | \$176,221 |
| (5) | October 2000 | \$117,254 |

AG-19-34 Referring to the Company's response to Information Request AG-1-90, please indicate whether outside services costs are directly assigned to NiSource companies when they are directly attributable to one or more of those companies.

- AG-19-35 Referring to the Company's response to Information Request AG-1-90, please itemize and quantify any Outside Service allocated to Bay State Gas that cost the NCSC \$500,000 or more during 2004. Please also provide a detailed description of the particular services provided during the test year.
- AG-19-36 Referring to the Company's response to Information Request AG-1-93, please indicate whether the General Counsel Retainer Services referred to in that response were put out to bid.
- AG-19-37 Referring to the Company's response to Information Request AG-1-94, please indicate the dollar amount of political contributions made by NiSource and / or any of its affiliates that were allocated to Bay State Gas Company during the test year in this case.
- AG-19-38 Referring to the Company's response to Information Request AG-1-97, please indicate whether NiSource's outside auditors provided any consulting services to the Company during any of the last three years. If so, please itemize the types of consulting services and quantify the costs of such services.

DATED: June 15, 2005.